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COMMISSION  
WASHINGTON, D.C.

American Association of **Orthodontists**

Dec 15 10 11 AM '98

401 North Lindbergh Boulevard • St. Louis, Missouri 63141-7816 • 314/993-1700 Fax: 314/997-1745

December 14, 1998

*Via Overnight Delivery*

Mr. Richard Ng, Report Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Identification Number: C00293910

Reference: October Quarterly Report (7/1/98 - 9/30/98)

Dear Mr. Ng:

This letter is in reply to the FEC's letter to me from John D. Gibson dated December 10, 1998 (copy enclosed). Mr. Gibson stated that as of December 9, 1998 the Commission had not received our response to your request for additional information dated November 18, 1998.

Please be advised that on December 2, 1998 I did respond to your November 18 letter, a copy of which response is enclosed. This response was forwarded to you on December 2 via UPS overnight delivery. Also enclosed is a second copy of my letter which shows our UPS shipping reference sticker printed the day the letter was sent, along with a copy of a tracking report from UPS showing that the letter was delivered the morning of December 3, 1998 and signed for by a person in your mailroom named Bailly.

I trust this will clear up any confusion. Please let me know if you need any further information.

Sincerely,

James M. Drinan  
Treasurer

Donald R. Foulton, DDS  
President  
2135 Webster Street  
San Francisco, CA 94115  
415/929-6551  
Fax: 415/929-6642

Mervin W. Graham, DDS  
President Elect  
7130 East Hampden Ave.  
Denver, CO 80224  
303/758-2366  
Fax: 303/699-4401

Michael D. Bennett, DDS  
Secretary-Treasurer  
5250 Desmar's Blvd., #403  
Montreal, Quebec H3X 2H9  
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Fax: 514/488-2441

Ronald S. Moyn  
Executive Director  
401 No. Lindbergh Boulevard  
St. Louis, MO 63141-7816  
314/997-1700  
Fax: 314/997-1745



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

December 10, 1998

James M. Drinan, Treasurer  
American Association of Orthodontists PAC  
401 North Lindbergh Boulevard  
St. Louis, MO 63141

Identification Number: C00293910

Reference: October Quarterly Report (7/1/98-9/30/98)

Dear Mr. Drinan:

This letter is to inform you that as of December 9, 1998 the Commission has not received your response to our request for additional information, dated November 18, 1998. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

The Commission is in receipt of your amendments for the October Quarterly and 12 Day Pre-Primary Reports dated December 3, 1998; however, they do not address the matters in our letter. If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Richard M. Ng on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over a horizontal line.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure



401 North Lindbergh Boulevard • St. Louis, Missouri 63141-7816  
(314) 993-1700 Fax (314) 997-1745

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December 2, 1998

Mr. Richard Ng, Report Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Dear Mr. Ng:

This letter is in reply to your letter to me, dated November 18, 1998 (ID# C00293910), regarding the American Association of Orthodontists PAC (AAOPAC) report for the third quarter of 1998. Your letter raised the question of whether the \$4,000 contribution made by AAOPAC to the Jim Turner for Congress Committee on September 14, 1998, exceeded the limits of the Act in light of a \$2,000 contribution to the same committee by the AAOPAC on November 18, 1996.

As you and I discussed via telephone today, the \$2,000 contribution on November 18, 1996 was a debt retirement contribution, and thus allocated to the 1996 general election. I have confirmed with the committee and with you that the committee did have debt after the November 1996 general election, and thus was eligible for a debt retirement contribution. The committee staff informed me that the contribution was allocated to the 1996 general election in its records.

The AAOPAC report filed in 1996 identified the \$2,000 as disbursed for the general election, which was intended to convey the 1996 general election rather than the next election facing Rep. Turner, which would have been the 1998 primary. We could have made our report clearer by adding "debt retirement" to the purpose of disbursement box, and will do so from now on for such disbursements.

We appreciate your assistance in clarifying this issue and trust that this response resolves any questions you had. Please let me know if you need any further information.

Sincerely,

A handwritten signature in dark ink, appearing to read "James M. Drinan", is written over a horizontal line.

James M. Drinan  
Treasurer

cc: Dr. Peter C. Knudson, Chairman



401 North Lindbergh Boulevard • St. Louis, Missouri 63141-7816  
(314) 993-1700 Fax (314) 997-1745

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December 2, 1998

Mr. Richard Ng, Report Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

667-797 12/2/98 WT 0.2 LBS  
PKG ID 4423456 SERVICE 1DA  
REF#  
TRACKING# 126677970144234566

PUB PKG CHG \$ 19.00  
DV \$ 0.00 COD \$ 0.00  
DC \$ 0.00 CT \$ 0.00  
AM \$ 0.00 SD \$ 0.00  
HNDL \$ 0.00 SP \$ 0.00  
NTFY \$ 0.00 HZMT \$ 0.00  
TOTAL NET GUST CHG \$ 19.00  
TOTAL PUB PKG CHG \$ 19.00

Dear Mr. Ng:

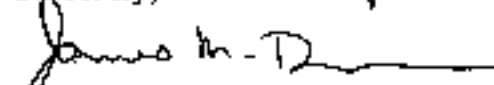
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Sincerely,

  
James M. Drinan  
Treasurer

cc: Dr. Peter C. Knudson, Chairman

PACKAGE TRACKING RESPONSES - History  
Inquiry#: 1Z6677970144234566 Type: PKG

Shipper ID:

Tracking#: 1Z6677970144234566

Address

Service Level: NEXT DAY AIR  
Pickup Date: 12/2/98  
Loc. Received: MAIL ROOM  
Signed By: BAILY

WASHINGTON, DC

\*\*\* Package Scan History \*\*\*

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Scan Type	Date/Time	City/State
D	12/3/98 9:26 AM	D.C.-METRO DC
Status Description: DELIVERY		
Status Message: DELIVERED		
Error Message:		

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Scan Type	Date/Time	City/State
I	12/3/98 7:22 AM	DC SORT MD
Status Description: LOCATION SCAN		
Status Message: LOCATION SCAN		
Error Message:		

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Scan Type	Date/Time	City/State
I	12/3/98 7:05 AM	DC SORT MD
Status Description: ARRIVAL		
Status Message: ARRIVAL		
Error Message:		

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Scan Type	Date/Time	City/State
I	12/3/98 6:10 AM	BALTIMORE MD
Status Description: DEPARTURE SCAN		
Status Message: DEPARTURE SCAN		
Error Message:		

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Scan Type	Date/Time	City/State
I	12/3/98 5:37 AM	BALTIMORE MD
Status Description: ARRIVAL		
Status Message: ARRIVAL		
Error Message:		

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Scan Type	Date/Time	City/State
I	12/3/98 3:01 AM	GREATER ROCKFORD IL
Status Description: DEPARTURE SCAN		
Status Message: DEPARTURE SCAN		
Error Message:		

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Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>12-15-98</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	

<i>ASH</i>	<i>12-15-98</i>
PREPARER	DATE PREPARED